## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHENMING HOLDINGS (HONG KONG) LIMITED, a Hong Kong limited company,

Civil Case No. 1:24-cv-00935-KPF

Plaintiff,

-against-

JOHN DOES 1-10, individuals and/or entities whose names are currently unknown to Plaintiff,

DECLARATION OF VINCENT FILARDO, JR., ESQ. IN SUPPORT OF PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY

Defendants.

- I, Vincent Filardo, Jr., the undersigned, hereby declare and state under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:
- 1. I am a partner at the law firm of King & Wood Mallesons LLP, counsel for Plaintiff Chenming Holdings (Hong Kong) Limited ("Chenming" or "Plaintiff") in the above captioned matter. I am fully familiar with the proceedings in this action. I submit this declaration in support of Plaintiff's Motion for Expedited Discovery ("Motion"), the declaration is based on my personal knowledge of the facts set forth herein.
- 2. Attached hereto as **Exhibits A through C** are true and correct copies of form subpoenas that Plaintiff proposes to serve on the non-party banks and banking associations: (i) Citibank, N.A., New York; (ii) JPMorgan Chase & Co.; and (iii) Community Federal Savings Bank.

DATED: February 26, 2024 New York, New York

/s/ Vincent Filardo, Jr.
Vincent Filardo, Jr.

**CERTIFICATE OF SERVICE** 

I hereby certify that I electronically filed the foregoing document with the Clerk of the

Court using CM/ECF. Since the identities of Defendants are unknown to Plaintiff, I was unable

to send a copy of the foregoing document and the accompanying motion papers to Defendants or

their counsel at this time.

By: /s/ Vincent Filardo, Jr.
Vincent Filardo, Jr.

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